

Hon. Raymond J. Dearie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
June 4, 2015

RE: USA v. Charles Blazer (Criminal Docket No. 13-602) – Request to file and unseal defendant's plea agreement

Dear Judge Dearie,

I am a reporter for The New York Times. I write to request the filing and unsealing of the defendant Charles Blazer's plea agreement.

The plea agreement was entered as a court exhibit in the defendant's plea hearing of 11/25/2013, docket no. 5, transcript unsealed as docket no. 19. The agreement was entered as Court Exhibit no. 1, referenced on p. 18 of the transcript, making it part of the official court record. On May 29, you ordered the plea transcript unsealed, partially redacted and filed. I ask that you also order that the plea agreement be filed and unsealed.

I make this request under the right of access to judicial documents grounded in the federal common law and in the First Amendment. As you are aware, the right of access is an affirmative, enforceable public right, and the standing of the press to enforce it is well settled.

Respectfully,

Stephanie Clifford
The New York Times
212-556-1434
sclifford@nytimes.com